

IN THE UNITED STATES DISTRICT COURT, DISTRICT OF MARYLAND

YVONNE ALSTON,

Plaintiff,

vs.

EMBRACE HOME LOANS, FREEDOM
PLUS/CROSS RIVER, CITIZENS BANK NA,
CROSSCOUNTRY MORTGAGE INC.,
ONEMAIN FINANCIAL, INC., PROSPER
MARKETPLACE INC., FIRST NATIONAL
BANK OF OMAHA, DISCOVER FINANCIAL
SERVICES, DISCOVER BANK,
ADVANCEPOINT CAPITAL, CNU ONLINE
CASHNETUSA, GEGRB/SYNCHRONY BANK,
VIVINT SOLAR INC., ELAN FINANCIAL
SERVICES, AMERIPRISE AUTO AND HOME,
PHYSICIAN'S LIFE INSURANCE,
MONTGOMERY WARD, SUNTRUST BANK,
POWER WINDOW AND SIDING, and
PRIMARY RESIDENTIAL MORTG,

Defendants.

CASE NO. _____

(Removed from the Circuit Court for
Prince George's County, Maryland
Case No.: CAL-16-44036)

PHYSICIANS LIFE INSURANCE COMPANY'S NOTICE OF REMOVAL

Pursuant to 228 U.S.C. §§ 1331, 1441, and 1446, Defendant Physicians Life Insurance Company ("Physicians Life") hereby removes the subject action from the Circuit Court for Prince George's County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. Plaintiff Yvonne R. Alston served Physicians Life on or about December 20, 2016, with a Summons and Complaint filed in the Circuit Court for Prince George's County, Maryland. Copies of the Summons and Complaint are attached hereto as Exhibit A and Exhibit B. No other process, pleadings or orders have been served on Physicians Life.

2. In the Complaint, Plaintiff alleges and claims that Physicians Life violated and is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). *See Complaint*, ¶¶ 42-49.

3. This Court has original jurisdiction over the subject matter pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this action arises under the FCRA which supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441 *et seq.*, this cause may be removed from the Circuit Court for Prince George's County, Maryland to the United States District Court for the District of Maryland.

5. Physicians Life has confirmed with the clerk of the Circuit Court of Prince George's County, Maryland, both online and by telephone, that to date, no other Defendant has been served in this action. To the best of Physicians Life's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice of Removal.

6. Notice of this Removal will promptly be filed with the Circuit Court for Prince George's County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Physicians Life Insurance Company, by counsel, removes the subject action from the Circuit Court for Prince George's County, Maryland to the United States District Court, District of Maryland.

Respectfully submitted,

PHYSICIANS LIFE INSURANCE COMPANY,
Defendant



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ATTORNEYS FOR THE DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **5th day of January, 2017**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **5th day of January, 2017**, properly addressed as follows:

<u>Pro Se Plaintiff</u> Yvonne Alston 10012 Cedarhollow Lane Largo, MD 20774	
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